



Jason I. Ser
Partner

Direct (646) 539-3712
Fax (212) 655-3535
jis@msf-law.com

November 7, 2023

VIA ECF

Hon. Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
Courtroom 705
New York, New York 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:

A handwritten signature in black ink that reads "Paul G. Gardephe".

Paul G. Gardephe, U.S.D.J.

Date: December 11, 2023

Re: *United States v. Roman Israilov, 22-cr-20 (PGG)*

Dear Judge Gardephe:

We write on behalf of defendant Roman Israilov in the above-referenced matter to respectfully request that the Court modify his conditions of pretrial release and expand his bail travel restrictions to include travel to the Southern District of Florida. Mr. Israilov's current conditions restrict his travel to the Southern and Eastern Districts of New York. (Dkt. No. 12).

We have discussed this request with the Pretrial Services Office (Officer Gialanella). Ms. Gialanella informed us that her office has no objection to the proposed modification expanding Mr. Israilov's travel restrictions to include travel to the Southern District of Florida. We also contacted the government (AUSA Allison) about the instant request. The government informed us that it defers to the position of Pretrial Services, as it did for Alex Gulakov who made an identical application on November 3, 2023, which this Court granted earlier today. (Dkt. No. 351)

Should the Court grant the instant request, the parties agree that the letter motion filed earlier today on behalf of Mr. Israilov regarding travel to Florida (Dkt. No. 350) will become moot.

Respectfully Submitted,

/s/ JIS

Henry E. Mazurek
Jason I. Ser
Meister Seelig & Fein LLP
125 Park Avenue, Suite 700
New York, New York 10017

Counsel for Defendant Roman Israilov

cc: Counsel of Record (*via ECF*)